

Exhibit 3

BEFORE THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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SONOS, INC.,)
)
Plaintiff,)
)
vs.) CASE NO. 3:21-CV-07559 WHA
)
GOOGLE, INC.,)
)
Defendant.)
_____)
GOOGLE, INC.,)
)
Plaintiff,)
)
vs.) CASE NO. 3:20-CV-06754 WHA
)
SONOS, INC.,)
)
Defendant.)
_____)

CORRECTED TRANSCRIPT
REMOTE WEB VIDEOCONFERENCE DEPOSITION
DEPONENT: TOMER SHEKEL
LOCATION: ISRAEL
WEDNESDAY, NOVEMBER 23, 2022

STENOGRAPHICALLY REPORTED BY:
ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~
CSR LICENSE NO. 9830
JOB NO. 5594467

BEFORE THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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SONOS, INC.,)
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Plaintiff,)
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vs.) CASE NO. 3:21-CV-07559 WHA
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GOOGLE, INC.,)
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Defendant.)
_____)
GOOGLE, INC.,)
)
Plaintiff,)
)
vs.) CASE NO. 3:20-CV-06754 WHA
)
SONOS, INC.,)
)
Defendant.)
_____)

Remote web videoconference Deposition of
TOMER SHEKEL, taken on behalf of the Plaintiff,
Pursuant to Notice, on Wednesday, November 23,
2022, beginning at 8:30 a.m., Israel Standard Time,
and ending at 2:13 p.m., Israel Standard Time,
before me, ANDREA M. IGNACIO, CSR, RPR, CCRR, CRR,
CLR ~ License No. 9830.

1 A P P E A R A N C E S :

2
3
4 FOR THE PLAINTIFF:

5 LEE SULLIVAN SHAE & SMITH LLP

6 By: DAVID R. GROSBY, Esq.

7 COLE B. RICHTER, Esq.

8 656 W. Rudolph Street, Suite 5W

9 Chicago, Illinois 60661

10 312.754.9602

11 ggrosby@ls3ip.com
12
13

14 FOR THE DEFENDANTS:

15 QUINN EMANUEL URQUHART & SULLIVAN

16 By: JAMES D. JUDAH, ESQ.

17 50 California Street, 22nd Floor

18 San Francisco, California 94111

19 415.875.6600

20 jamesjudah@quinnemanuel.com
21

22 ALSO PRESENT: David West, Videographer

23 Patrick Weston, Google Inc.
24

25 ---oOo---

Page 3

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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

TOMER SHEKEL,

having been remotely sworn as a witness

by the Certified Shorthand Reporter,

testified as follows:

STENOGRAPHIC REPORTER: Counsel, you may
proceed.

EXAMINATION

BY MR. GROSBY:

Q Hi, Mr. Shekel. Can you please state and 08:42
spell your name for the record, please. 08:42

A My name is Tomer Shekel. T-O-M-E-R, 08:42
S-H-E-K-E-L. 08:43

[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] 08:43

1 [REDACTED] 08:52

2	Q	And when did you start working at Google?	08:52
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3	A	I started working on October 2013.	08:52
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4	Q	And what was your title when you started	08:52
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5 | working at Google?                                08:52
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6	A	I was a product manager.	08:52
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7	Q	And how long did you hold that title?	08:53
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8 | A Well, I -- I -- I'm still a product manager 08:53

9 | in Google, so I'm still in the same type of work. 08:53

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10 | There's internal levels or -- kind of within it, like, 08:53
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11	a product manager, senior product manager, and so	08:53
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12 forth. And that aspect of the title, it changed, but 08:53

13 I'm still working as a product manager within Google. 08:53

14

	[REDACTED]	
--	------------	--

	[REDACTED]	
--	------------	--

	[REDACTED]	
--	------------	--

	[REDACTED]	
--	------------	--

08:55

1 [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
8 Q Which products did you work on during your 08:57
9 time as a product manager of that team? 08:57
10 A One of the projects was Cast Audio. 08:57
11 Q What other products? 08:57
12 A Another project was Chromecast Audio. 08:57
13 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
18 Q Any others? 08:58
19 A I was involved in the Google Home product. 08:58
20 Q Any others? 08:58
21 A I was involved in the multi-room speaker 08:58
22 playback. 08:58
23 [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] 08:58

1 [REDACTED] [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED] 12:11
5 MR. GROSBY: Q. And when did Google develop 12:11
6 its own first-party multi-zone technology? 12:11
7 A During 2015. 12:11
8 Q So that was after -- that was after you 12:11
9 looked at other speaker manufacturers' implementations 12:11
10 of multi-zone technology; right? 12:11
11 [REDACTED] [REDACTED] 12:11
12 THE WITNESS: So I wouldn't say that I looked 12:11
13 at the implementation, but I used -- maybe I -- I 12:11
14 tried using multi-zone by few of the other 12:11
15 manufacturers. 12:12
16 So chronologically, at least for some of the 12:12
17 manufacturers, it happened before that we -- before we 12:12
18 launched it -- before we launched our own multi-room 12:12
19 solution. 12:12
20 MR. GROSBY: Q. And one of those was Sonos; 12:12
21 correct? 12:12
22 [REDACTED] [REDACTED] 12:12
23 THE WITNESS: We looked at Sonos and other 12:12
24 manufacturers' multi-room solution as part of our work 12:12
25 in Cast Audio, and that -- some of those looks or 12:12

1 [REDACTED] [REDACTED] [REDACTED]
2 [REDACTED] 13:59
3 MR. GROSBY: Q. In order to create speaker 13:59
4 groups, is the Google Home app required? 13:59
5 [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED] 13:59
7 THE WITNESS: I don't know how it is today. 13:59
8 But when I was working on groups, if I want to say 13:59
9 Google Cast group or Cast technology group, I'm not 13:59
10 talking about any OEM groups that we discussed before, 13:59
11 you needed to have the Google Home app or the 14:00
12 Chromecast app or -- I don't remember the names as it 14:00
13 changed. You need to have an app that was used to set 14:00
14 up the -- the groups at that time when we launched 14:00
15 multi-room. 14:00
16 [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] 14:01

CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO, hereby certify that the witness in the foregoing remote deposition was by me remotely sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript [] was [x] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

Dated: November 28, 2022

A handwritten signature in blue ink, appearing to read 'Andrea M. Ignacio', is written over a horizontal line.

ANDREA M. IGNACIO, RPR, CRR, CCRR, CLR, CSR No. 9830

ERRATA SHEET

Case Names: *Google LLC v. Sonos, Inc.*
Case No. 3:20-cv-06754-WHA

Sonos, Inc. v. Google LLC
Case No. 3:21-cv-07559-WHA


Deposition Date: November 23, 2022

Deponent: Tomer Shekel

I, Tomer Shekel, do hereby certify that I read the foregoing transcript of my testimony taken on November 23, 2022, and further certify that it is a true and accurate record of my testimony, with the exception of the corrections listed below:

Page	Line	Now Reads	Should Read	Reason
17	8	Interruption	Interaction	Transcription error
19	13	To extend	And explain	Transcription error
22	1	Anhil	Anschel	Transcription error
22	3	Hamil Shaw	Hemal Shah	Transcription error
28	16	Roanoke Shab	Raunaq Shah	Transcription error
28	18	Wenbo Zhu	Bibu Xu	Transcription error
69	23	Scanning	Scaling	Transcription error
78	21	Yukon	Group of	Transcription error
79	10-11	base from the operating group	multiple people from the group	Transcription error
79	11	for example	Folks who were	Transcription error
79	19	Meets	Meeting	Transcription error
92	12	All	Our	Transcription error
115	24	Bigger	Legal	Transcription error
123	8	Zao	Zhou	Transcription error
123	10	Zao	Zhou	Transcription error
123	11	Zao	Zhou	Transcription error
123	14	Zao	Zhou	Transcription error
128	23	Next app	Next track	Transcription error
132	24	Screen services	Streaming services	Transcription error
137	3	Pictures	Features	Transcription error
137	14	Other	As for	Transcription error

Dated: 12/25/2022

By: 
Tomer Shekel